Indiana Department of Natural Resources Division of Forestry State Forest Resource Management Guide Public Comment Summary

SUMMARY COMMENTS

The table below is a summary of public comments received concerning the draft Resource Management Guide. The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

Comment Summary

- General concern or opposes prescribed managed harvest for following reasons:
 - Potential impacts to Indiana Bat and potentially other RTE species
 - Potential impacts to forest ecosystem, biodiversity, habitat composition and wildlife
 - Potential impacts on climate change and carbon sequestration
 - Potential impacts on soils and water quality
- Suggest tract be evaluated and considered for possible set aside for high conservation values.
- Concerns about stainability of overall State Forest timber harvest levels
- Recommends detailed flora and fauna inventory be conducted/included in RMG.
- Suggests DoF should focus management on interior forest habitats
- Concern on potential for soil erosion and sedimentation and the effective implementation of BMPs, including riparian buffers.
- Concern on control efforts and potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods only).
- Supports the management and retention of snags and cavity trees for wildlife values as outlined in the RMG
- Objects to harvest and utilization of Ash trees ahead of Emerald Ash Borer infestations. Concern that removals will eliminate potentially resistant trees and not slow the spread of EAB
- Suggests DoF evaluate impacts on climate change and carbon sequestration. Or, put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state on carbon sequestration and climate change.

Division of Forestry Response

- As standard practice, the Division of Forestry consults with and utilizes guidance from the US Fish and Wildlife Service and other sources to conserve habitat and avoid take impacts to the Indiana bat.
- Habitats, communities and wildlife species are considered as part of the
 management planning process. Along with field observations, Natural heritage
 data has been reviewed to check for threatened or endangered bird and wildlife
 species on or near the management unit. As a protective measure the location of
 RTE species (if any) are not disclosed in the RMG.
- Concern also addressed in the DoF Environmental Assessment. HEE and other
 research continue to document forest impacts and indicate increased biodiversity
 in managed forests. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf
- Detailed flora and fauna inventories are beyond the scope of tract level management guides.
- Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns. Riparian areas were specifically noted in the RMG. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures.
- Invasive species presence and control needs are incorporated in the RMG and will be monitored as part of normal operations. A variety of management measures are considered in an overall integrated pest control strategy, including manual controls, defensive plantings and treatments with approved herbicides. Strictly manual measures are seldom effective control strategies by themselves.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- EAB is now found in nearly all of Indiana's 92 counties and widespread across Indiana forests. State Forests are a relatively small part of the forest make up in Indiana. While the prescription will remove many infected Ash trees it will not slow the spread of EAB. Prescribed regeneration opening will capture some ash seed and regeneration which will escape the initial wave of EAB. Recruiting Ash

